CKR LAW LLP

1330 Avenue of the Americas, 14th Floor

New York, New York 10019 Telephone: (212) 259-7300 Facsimile: (212) 259-8200 Edward L. Schnitzer, Esq.

Counsel to Eastern Prime Textiles Limited

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK		
	Х	
In re:	:	Chapter 11
SEARS HOLDINGS CORPORATION, et al.,	:	Case No. 18-23538-rdd
Debtors.	:	(Joint Administration Pending)
	:	

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. § 1109(b) and Fed. R. Bankr. P. 9010(b), CKR Law LLP, as counsel to Eastern Prime Textiles Limited, a creditor and party in interest in the bankruptcy cases of Sears Holding Corporation, *et al.* (the "Debtors"), the above-captioned debtor, hereby demands service of all notices and papers herein upon:

Eastern Prime Textiles Limited c/o Edward L. Schnitzer, Esq. CKR Law LLP 1330 Avenue of the Americas, 14th Floor New York, NY 10019 T: (212) 259-7300 F: (212) 259-8200

E: <u>eschnitzer@ckrlaw.com</u>

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind, including, without limitation, all notices, motions, and orders, whether written or oral, formal or informal, however transmitted.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and

Demand for Service of Papers (the "Notice") nor any later appearance or pleading shall constitute a waiver of:

- a) rights to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Judge;
- b) rights to trial by jury in any proceedings as to any and all matters so triable, whether or not the same be designated legal or private rights, or in any case, controversy or pursuant to 28 U.S.C. § 157(b)(2), and whether such jury trial right is pursuant to statute or the United States Constitution;
- c) rights to seek abstention or remand of any matter or proceeding subject to mandatory discretionary abstention or remand, and to have the District Court withdraw the reference in any matter or proceeding subject to mandatory or discretionary withdrawal;
- d) rights to receipt of service of process in all actions, causes, claims, or proceedings arising in, arising under or related to these proceedings to be served directly on Trustee; or
- e) rights to contest service of process.

All of the above rights are expressly reserved and preserved by Eastern Prime Textiles Limited without exception.

Dated: New York, New York October 18, 2018 CKR LAW LLP

/s/ Edward L. Schnitzer

Edward L. Schnitzer 1330 Avenue of the Americas, 14th Floor New York, NY 10019

T: (212) 259-7300 F: (212) 259-8200

E: eschnitzer@ckrlaw.com

Counsel to Eastern Prime Textiles Limited

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument has been served on this 18th day of October, 2018 upon all parties requesting service via ECF notification.

/s/ Edward L. Schnitzer

Edward L. Schnitzer 1330 Avenue of the Americas, 14th Floor New York, NY 10019 T: (212) 259-7300

F: (212) 259-8200

E: eschnitzer@ckrlaw.com